

# CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI  
MAYOR

## EMERGENCY MANAGEMENT DEPARTMENT

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January 13, 2016

Ms. Marlene Dortch  
Secretary, Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington DC 20554

RE: IMPROVING WIRELESS EMERGENCY ALERTS AND COMMUNITY-INITIATED  
ALERTING: PUBLIC SAFETY DOCKET 15-91

Dear Ms. Dortch and Members of the Federal Communications Commission

The City of Los Angeles Emergency Management Department has reviewed the proposed changes to the Wireless Emergency Alerts (WEA) program and makes the following recommendations:

**1. Improving Effectiveness of WEA message content:**

- **Proposal to expand character length of WEA messages from 90-360**
  - *The City of Los Angeles AGREES with this proposal. Expanding the amount of characters available will help provide accurate and detailed information to the public.*
- **Proposal to create a new class of WEA alerts called "Emergency Government Information"**
  - *The City of Los Angeles AGREES with this proposal. This new class of alerts greatly expands our ability to send alerts that may not necessarily fall into the original three categories.*
- **Proposal to allow phone numbers and URL's in WEA content**
  - *The City of Los Angeles AGREES with this proposal. The City of Los Angeles maintains an emergency hotline and webpage where more detailed information can be maintained.*

- **Proposal to supplement WEA messages with multimedia (videos, pictures, etc.)**
  - *The City of Los Angeles AGREES with this proposal. Sending a multimedia message will provide the City of Los Angeles with another tool to inform the public of an emergency.*
- **Proposal to deliver WEA messages in languages other than English**
  - *The City of Los Angeles AGREES with this proposal. The City of Los Angeles has a great number of individuals that would benefit from emergency alerts in languages other than English.*
- **Proposal to allow subscribers to opt-out of WEA notifications**
  - *The City of Los Angeles is NEUTRAL on this proposal. The City of Los Angeles feels that if used properly, the number of individuals that opt out of emergency alerts will be negligible. However, we do not feel an individual should be prohibited from opting out should they choose to do so.*
- **Proposal to change audio alerts**
  - *The City of Los Angeles is NEUTRAL on this proposal. The City of Los Angeles does not feel changing the audio alerts will have either a positive or negative effect on the amount of individuals that receive the alert.*

## 2. Improve Geo-targeting:

- **Proposal to require Participating Commercial Mobile Service Providers to distribute WEA messages to a geographic area that more accurately matches the target area specified by the originator**
  - *The City of Los Angeles AGREES with this proposal. Any improvement to the geo-targeting capabilities of the system is beneficial.*

## 3. Facilitating testing and training:

- **Proposal to establish requirements and procedures to facilitate state and local WEA testing and proficiency training.**
  - *The City of Los Angeles AGREES with this proposal. The City of Los Angeles has only used the system once. Any additional testing would help in the event of an actual event that required a WEA use.*
- **Comments on logging and reporting requirements for Participating CMS Provider Alert Gateways**
  - *The City of Los Angeles believes that report requirements will help originators target and refine message more accurately.*

- **Comments on steps the Commission can take to promote participation**
  - *The Commission can begin a public outreach campaign similar to the ones local agencies conduct to promote awareness of a new program in their jurisdiction.*
- **Comments on different alternatives for displaying and receiving WEA messages to reduce likelihood of “opting out”**
  - *The Commission should ensure that tests are conducting infrequently and actually broadcasts are sent only when necessary.*
- **Election process by which CMS Providers choose to participate in WEA**
  - *The City of Los Angeles does not have any comments on this process.*
- **Opinion on allowing WEA Attention Signal to be used as part of PSAs**
  - *The City of Los Angeles DISAGREES with this proposal with concerns that the public will opt-out of emergency messages entirely.*
- **Comments on whether and how testing of the broadcast-based WEA infrastructure should be implemented**
  - *The City of Los Angeles does not have any comments on this proposal.*
- **Comments on whether WEA alerts should take priority over all mobile device activity except for certain voice and data sessions.**
  - *The City of Los Angeles AGREES that WEA alerts should take priority over all device activities except for certain voice and data sessions, which include 911 calls.*

The City of Los Angeles has been fortunate enough to not have to use the WEA system as often as other major metropolitan cities in the United States. However, we remain vigilant and ready to use the system should the need arise. The City welcomes and applauds the Commission for its proactive attempts to improve the system and look forward to the seeing the proposed changes implemented.

Sincerely,



JAMES G. FEATHERSTONE  
General Manager